

REMARKS

Claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

35 USC 112 First Paragraph Rejection of Claims 1, 2, 4-8, 10, 13, 15-19 and 27-52

The Office Action rejected claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 as allegedly failing to comply with the enablement requirement under 35 USC 112. In particular, the Examiner alleged that there is no description in Applicants' specification for a "simple network transport protocol".

The phrase "simple network transport protocol" is being deleted from claims 1, 2, 4-8, 10, 13, 15-19 and 27-52, making the rejection of claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 under 35 USC 112, first paragraph now moot.

It is respectfully submitted that claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 are now in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

35 USC 112 Second Paragraph Rejection of Claims 1, 2, 4-8, 10, 13, 15-19 and 27-52

The Office Action rejected claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 as allegedly being indefinite under 35 USC 112.

The phrase "simple network transport protocol" is being deleted from claims 1, 2, 4-8, 10, 13, 15-19 and 27-52, making the rejection of claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 under 35 USC 112, second paragraph now moot.

It is respectfully submitted that claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 are now in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

Claims 8, 10 and 29-32 over Gupta

In the Office Action, claims 8, 10 and 29-32 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,374,305 to Gupta et al. ("Gupta"). The Applicants respectfully traverse the rejection.

Claims 8, 10 and 29-32 recite a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header.

The Examiner alleged that Gupta discloses forwarding a packaged message to a back-end server via a message router over a non-IP network at Figs. 2 and 3; and col. 4, lines 40-45 (See Office Action, page 3). The Examiner relied on Gupta's incorporation by reference to U.S. Patent No. 5,580,517 to Verkler et al. ("Verkler") at col. 7, lines 1-40 to allegedly disclose a non-IP wireless network (See Office Action, page 3).

Even if Gupta discloses forwarding a packaged message to a back-end server via a message router over a non-IP network, as alleged by the Examiner, Gupta fails to disclose the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header, as recited by claims 8, 10 and 29-32.

A benefit of a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header is, e.g., low overhead. Use of a non-IP protocol with a maximum six byte header to assist in deploying content to a mobile client application minimizes network requirements while still containing features conventionally found in an IP protocol such as message segmentation, message segmentation reassembly, message retries and message duplication. Minimizing network requirements is an important consideration as networks are more heavily taxed with voice

information, video information and text data over a limited bandwidth network. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 8, 10 and 29-32 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 over Gupta in view of Aravamudhan

In the Office Action, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gupta in view of U.S. Patent No. 6,563,919 to Aravamudhan et al. ("Aravamudhan"). The Applicants respectfully traverse the rejection.

Claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 recite a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header.

As discussed above, Gupta's invention is directed to providing alternate paths for a client device to access a server. However, Gupta's system and method fails to disclose or suggest a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

The Office Action relies on Aravamudhan to allegedly make up for the deficiencies in Gupta to arrive at the claimed invention. The Applicants respectfully disagree.

Aravamudhan appears to disclose a unified mobility manager (UMM) 30 that unifies implementation and processing of mobile communications

by various mobile system, such as cellular/mobile telephones, pagers, personal computers, PDAs, etc., that operate on different communication protocols (Fig. 2; col. 6, lines 16-25). The UMM is capable of receiving messages for different networks, such as mobile IP (Aravamudhan, col. 6, lines 37-51). A mobile device sends a mobile IP message over a wireless network to a protocol gateway using mobile IP (Fig. 5; col. 9, lines 38). The protocol gateway converts a Network Specific Identity to a Network Non-specific Identity (Fig. 5; col. 9, lines 38).

Aravamudhan discloses a method and apparatus for allowing a plurality of devices using a plurality of protocols to use a centralized system for conversion to a generic format to access a Unified Directory Service (Fig. 5). A mobile IP device sends mobile IP protocol messages over a mobile IP protocol network for access to a Unified Directory Service (Aravamudhan, Fig. 5). Thus, Aravamudhan fails to disclose or **suggest** a system and method of deploying content to a mobile client application and a wireless network over a non-IP protocol, much less a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

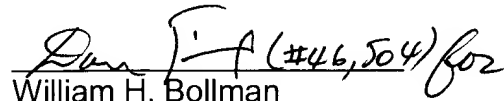
Thus, even if it were obvious to modify Gupta with the disclosure of Aravamudhan (which it is not), the theoretical result would use one or more of TCP/IP, PPP, native published interfaces, mobitex interface and mobile IP protocol NOT a non-IP protocol being adapted to support at least one of message segmentation, message segmentation reassembly, message retries and message duplication with a maximum six byte header, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

Accordingly, for at least all the above reasons, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Bollman" with a stylized flourish at the end.

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